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MAIL BRANCH



CONSUMER ELECTRONICS GROUP

**DYNASCAN CORPORATION**

6500 WEST CORTLAND STREET  
CHICAGO, ILLINOIS 60635

ORIGINAL  
FILE

October 30, 1992

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Donna R. Searcy, Secretary  
Federal Communications Commission  
1919 M. St., NW  
Washington, D.C. 20554

Dear Ms Searcy:

Enclosed please find the original and twelve copies of Dynascan Corporation's comments on RM:8094, in the matter of Request Amendment of the Commission's Rules to establish New Frequencies for Cordless Telephones near 44 and 49 MHz. Please distribute them to the appropriate parties for consideration.

An additional copy is enclosed, along with a self stamped envelope to be stamped with date received and returned to me.

Sincerely,

**DYNASCAN CORPORATION**

William J. Cole  
Vice President of Engineering  
Cobra Electronics Group

WJC:sg

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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In The Matter Of )  
 )  
Amendment of the )  
Commission's Rules to establish )  
New Frequencies for Cordless )  
Telephones near 44 and 49 MHZ )

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WILLIAMSON

RM: 8094

Comments of Dynascan Corporation

Dynascan Corporation ("Dynascan") is an American consumer electronics company which has been marketing cordless telephones since the late 1970's, under its Cobra trade name. As such, it believes it is well qualified to comment on this matter.

Dynascan is very pleased that the Commission has accepted the petition from the Telecommunications Industry Association's Personal Communications Section. Dynascan has long been a member of that organization, and is highly supportive of its petition for additional cordless telephone frequencies in the 44 and 49 MHz bands.


Projected statistics indicate that cordless telephone imports will exceed 17 million units in 1992, generating over 1 billion dollars in retail sales. That statistic is even more impressive when one considers the depressed state of the economy in the United States. As the demand for the freedom and convenience provided by cordless telephones increases, the congestion and resultant interference occurring on the existing 10 cordless channels will become a critical factor in the continued sale and use of such products. This congestion and interference is compounded by the existence of cordless baby monitors which are allowed to operate on 5 of the 10 cordless channels. Many of the baby monitors transmit on these 5 channels 24 hours a day.

Dynascan further believes, as stated in earlier Personal Communications Section filings, that the demand for low priced cordless telephone systems retailing for less than \$100 constitutes the bulk of the demand for consumer cordless telephones, and that future PCN systems will not meet the needs of such price conscious consumers.

Dynascan believes that unless the cordless telephone industry is to stagnate, with its products significantly limited in usefulness by overcrowding on existing channels, additional channels for cordless telephones must be made available. Therefore, Dynascan urges the Commission to adopt the proposal for 30 additional frequencies in the 44 and 49 MHz bands to be shared on a secondary basis, between cordless telephone and various land mobile usage, as outlined in the Personal Communications Section's petition, which Dynascan fully endorses. Furthermore, Dynascan urges the Commission to commit its intent with regard to use of these frequencies, through the timely issue of a Notice of Proposed Rulemaking, thereby allowing the cordless telephone industry to begin the research and development necessary to provide cordless telephones capable of operating on these new frequencies.

Respectfully Submitted by,

DYNASCAN CORPORATION  
(Cobra Electronics Group)

  
William J. Cole  
Vice President of Engineering

WJC:sg

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**Congress of the United States**  
**House of Representatives**  
**Washington, DC 20515-4327**

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*NMB  
Pomeroy  
PV*

*28/7*

September 21, 1992

Mr. Michael Ruger, Chief  
Allocations Branch  
Mass Media Bureau  
Federal Communications Commission  
2025 M Street NW  
Washington, D.C. 20554

AIRS

Dear Mr. Ruger:

I am writing this letter on behalf of Mr. Joe Cisneros who is attempting to upgrade his radio station in Bishop, Texas to better serve the minority population in and around Bishop, Texas.

During my recent visit with Mr. Cisneros, he expressed concern over the Commission's action in awarding a new station to Benavides, Texas as a result of FCC accepting a petition that did not comply with the Commission's rules. Mr. Cisneros indicated that he had pointed out the defect, but that the FCC apparently ignored his objection.

Radio Station KFLZ, FM presently serves the minority population in Nueces County with Spanish programming, and the station needs the power increase to maintain its ability to continue that public service. Neither Mr. Cisneros nor I can understand why the Benavides proposal received FCC approval when it was not in compliance with the Commission's own rules. Given the facts, as I understand them, I do not believe that the action taken on the Bishop proposal was equitable, fair or logical.

I am requesting that you as Chief examine the facts and contemplate reversing the action which denied the power increase at Bishop, Texas.

You may respond to my Corpus Christi District with your thoughts regarding this matter.

With kindest personal regards, I am

Sincerely,

*Solomon P. Ortiz*  
SOLOMON P. ORTIZ  
Member of Congress